

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,  
STATE OF MINNESOTA,  
STATE OF CALIFORNIA,  
STATE OF NORTH CAROLINA,  
STATE OF TENNESSEE,  
STATE OF TEXAS, and  
STATE OF UTAH,

*Plaintiffs,*

v.

AGRI STATS, INC.,

*Defendant.*

No. 0:23-CV-03009-JRT-JFD

**JOINT MOTION REGARDING CONTINUED SEALING**

Documents have been filed under temporary seal in connection with the following motion:

- Agri Stats, Inc.'s Motion to Transfer Venue, ECF No. 42.

Pursuant to Local Rule 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

DKT NO.	DKT. NO. OF REDACTED DOCUMENT (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree	NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
68	71	Agri Stats invoice to Pilgrim's regarding broiler chicken, dated 9/1/2014	The parties disagree whether the specific invoice amount for Agri Stats' broiler chicken related reports should remain sealed.	N/A	<p><b><u>Plaintiffs:</u></b> Plaintiffs contend the document should be unsealed in its entirety. The document contains charges by Agri Stats to a customer over nine years ago. Those charges are too dated to be competitively sensitive and therefore the presumption of public access should prevail.</p> <p><b><u>Agri Stats:</u></b> The unredacted document should remain sealed because it discloses competitively sensitive specific negotiated rates that Agri Stats charges for its reports. Agri Stats negotiates its rates with each subscriber</p>

					individually and they can remain static for years.
69	72	Agri Stats invoice to Clemens Food Group regarding pork, dated 3/1/2017	The parties disagree whether the specific invoice amount for Agri Stats' former pork related reports should remain sealed.	N/A	<p><b><u>Plaintiffs:</u></b> Plaintiffs contend the document should be unsealed in its entirety. The document contains charges by Agri Stats to a customer nearly seven years ago. Those charges are too dated to be competitively sensitive and therefore the presumption of public access should prevail.</p> <p><b><u>Agri Stats:</u></b> The unredacted document should remain sealed because it discloses competitively sensitive specific negotiated rates that Agri Stats charges for its reports. Agri Stats negotiates its rates with each subscriber individually and they can remain static for years.</p>
70	73	Agri Stats invoice to Perdue regarding turkey, dated 1/1/2016	The parties disagree whether the specific invoice amount for Agri Stats' former turkey related reports should remain sealed.	N/A	<p><b><u>Plaintiffs:</u></b> Plaintiffs contend the document should be unsealed in its entirety. The document contains charges by Agri Stats to a customer eight years ago. Those charges are too dated to be</p>

					<p>competitively sensitive and therefore the presumption of public access should prevail.</p> <p><b><u>Agri Stats</u></b>: The unredacted document should remain sealed because it discloses competitively sensitive specific negotiated rates that Agri Stats charges for its reports. Agri Stats negotiates its rates with each subscriber individually and they can remain static for years.</p>
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Dated: January 3, 2024

Respectfully submitted,

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